

### **REMARKS**

Applicants thank the Examiner for the thorough consideration given the present application. Claims 1-34 are pending in the present application. Claims 1, 2, 6, 15, 21, and 22 have been amended. Claims 1, 5, 13, 15, 20, 21, 25, and 33 are independent claims. The Examiner is respectfully requested to reconsider the outstanding rejections in view of the above amendments and the following remarks.

#### ***Allowable Subject Matter***

It is gratefully acknowledged that the Examiner has allowed claims 5, 13, 14, 20, 25, 33, and 34.

#### ***Rejection Under 35 U.S.C. § 103***

##### **Mok/Twyford Rejection**

Claims 1-3, 7-9, 15-17, 21-23, and 27-29 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,008,986 to Mok (hereafter "Mok") in view of U.S. Patent No. 6,386,413 to Twyford (hereafter "Twyford"). This rejection is respectfully traversed.

In the rejection, the Examiner states that, "Mok does not disclose a mounted displaying means being mounted in a fixed position in an automotive vehicle, nor does Mok disclose multiple operating projected positions" (Office Action at page 3, 2<sup>nd</sup> paragraph). The Examiner relies on Twyford to remedy these deficiencies, asserting that "[i]t would have been obvious to one skilled in the art to modify Mok to used fixed display means and multiple keyboard positions in order to improved stability and flexibility as taught by Twyford" (*Id.*).

Applicants respectfully submit that the Examiner has failed to establish a *prima facie* case of obviousness because there is no motivation to combine Mok and Twyford as suggested by the Examiner. Specifically, Mok and Twyford *teach away* from the Examiner's proposed combination.

Mok teaches a laptop computer. Thus, Mok teaches an arrangement where the keyboard 26 and display panel 24 (and other elements) are integrated in a single housing 18. See Figs. Thus, the orientation of the keyboard and display are *intrinsically dependent* on each other. For instance, Mok's display and keyboard must rotate on the same hinge -- they cannot rotate about different axes. Also, Mok expressly teaches that his laptop computer is a *portable* personal computer. See, e.g., col. 1, lines 55-67. Accordingly, Mok teaches away from being mounted in a fixed position.

Twyford, on the other hand, teaches a computer system *mounted* in a vehicle. In Twyford's computer system, the keyboard 14 and display unit 12 are not confined to a common housing. Instead, Twyford's keyboard and display are mounted on different sets of hinges, thereby allowing them to be rotated among different axes. Twyford expressly teaches that the keyboard and display are rotatable about different axes. For instance, Twyford's display can be rotated in directions B and C, while the keyboard can be rotated in directions D and E. See Fig. 1; col. 3, lines 20-50. This would not be possible if Twyford's computer system were confined to the housing of a laptop computer. Thus, Applicants submit that the teachings of Twyford relied on by the Examiner *cannot be applied to laptop computers* such as Mok's.

Applicants further wish to direct the Examiner's attention to MPEP § 2143.01, which states the following:

If [a] proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification.  
*In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).

Applicants respectfully submit that the proposed modification by the Examiner of Mok in view of Twyford renders the Mok patent unsatisfactory for its intended purpose and thus is not sanctioned by the provisions of 35 U.S.C. § 103. For reasons discussed above, Twyford's teachings of flexibility cannot be applied to a laptop computer and, thus, would require reconfiguring Mok's laptop into a completely different type of system. Also, an intended purpose of Mok's computer, as well as all other laptop computers, is portability. However, the Examiner's proposed modification

would cause Mok's system to be mounted in a vehicle, thus causing Mok's invention to be non-portable.

Therefore, Applicants respectfully submit that one of ordinary skill in the art would not have been motivated to combine Mok and Twyford as proposed by the Examiner. Accordingly, the Examiner has failed to establish a *prima facie* case of obviousness with respect to claims 1-3, 7-9, 15-17, 21-23, and 27-29.

At least for the reasons set forth above, Applicants submit that claims 1-3, 7-9, 15-17, 21-23, and 27-29 are allowable. Thus, reconsideration and withdrawal of this rejection is respectfully requested.

### **Other Rejections**

Claims 4, 6, 18, 24, and 26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mok and Twyford, and further in view of U.S. Patent No. 5,949,643 to Batio (hereafter "Batio").

Claim 19 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Mok, Twyford, and Batio, and further in view of U.S. Patent NO. 4,800,376 to Suga et al. (hereafter "Suga").

Claims 10-12 and 30-32 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mok and Twyford, and further in view of U.S. Patent No. 4,787,040 to Ames et al. (hereafter "Ames").

It is respectfully submitted that none of Batio, Suga, and Ames remedies the deficiencies of Mok and Twyford as set forth above. Specifically, none of Batio, Suga, and Ames provides a teaching or suggestion that would motivate one of ordinary skill in the art to combine Mok and Twyford as proposed by the Examiner. Since a *prima facie* case of obviousness has not been established with respect to independent claims 1, 15, and 21 for this reason, Applicants

respectfully submit that claims 4, 6, 10-12, 18, 19, 24, 26, and 30-32 are allowable at least by virtue of their dependency on these independent claims. Thus, reconsideration and withdrawal of these rejections is respectfully requested.

### ***Conclusion***

In view of the above remarks, it is believed that the claims clearly distinguish over the patents relied on by the Examiner, either alone or in combination. Accordingly, the Examiner is respectfully requested to reconsider the outstanding rejections and issue a Notice of Allowance in the present application.

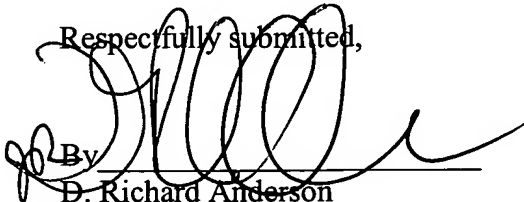
However, should the Examiner believe that any outstanding matters remain in the present application, the Examiner is respectfully requested to contact Jason W. Rhodes (Reg. No. 47,305) at the telephone number of the undersigned to discuss the present application in an effort to expedite prosecution.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Date:

**AUG 15 2006**

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. Anderson", is written over a horizontal line. The signature is fluid and cursive.

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